

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

CIVIL ACTION NO. 3:11-CV-30223

DEBRA BAGGETT, ON BEHALF OF HERSELF AND OTHER SIMILARLY SITUATED,
PLAINTIFFS

V.

MICHAEL J. ASHE, JR. AND PATRICIA MURPHY,
IN THEIR INDIVIDUAL CAPACITIES,
DEFENDANTS

DEFENDANTS' MOTION FOR A VIEW

NOW COME the Defendants in the above-captioned matter and respectfully request that this Honorable Court conduct a view at the Western Massachusetts Regional Women's Correctional Center (the "WCC") on Tuesday, April 22, 2014, either before or after the oral argument on the Defendants' and Plaintiffs' Motions for Summary Judgment, which is scheduled to take place at 11:00 a.m. on Tuesday, April 22, 2014. If April 22, 2014, is not a convenient date for the view, Defendants' request that this Court schedule the view for another date. In support of this Motion, Defendants state that movement of inmates to the higher security Segregation Unit at the WCC is a central issue in the Defendants' Motion for Summary Judgment. The papers related to the motion make detailed reference to the WCC generally, and inmate movement to the WCC's Segregation Unit, specifically. Defendants attach videos of moves to the WCC's Segregation Unit to their Motion for Summary Judgment and discuss, describe and attach policies and procedures governing those moves in said motion. Videos, policies and descriptions will not be adequate, and a view of the WCC and various of its units, including the Segregation Unit and the cells therein, will facilitate the Court's understanding of the WCC and the specifics of a move of an inmate to the WCC's Segregation Unit.

*DENIED without prejudice.. Following oral argument
the court may reconsider.
So ordered. Michael B. Ponsor USMJ
4-21-14*

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